

REMARKS

Claims 1-13 are all the claims pending in the application. By this amendment, Applicant adds claims 12-13. In addition, Applicant amends claims 1 and 10.

Preliminary Matters

As a preliminary matter, Applicant thanks the Examiner for acknowledging the claim to priority and for confirming that the certified copy of the priority documents was received.

The Examiner, however, failed to indicate whether the drawings filed on June 14, 2001 are accepted. Applicant respectfully requests the Examiner to acknowledge safe receipt of the drawings filed on June 14, 2001 and to indicate that the drawings are accepted in the next office paper.

Claims Rejections under 35 U.S.C. § 102(e)

The Examiner maintained the rejection of claims 1-4 and 6-11 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,473,664 to Lee et al. (hereinafter “Lee”). Applicant respectfully traverses this rejection and respectfully requests the Examiner to carefully reconsider the rejection in view of the following remarks.

To be an “anticipation” rejection under 35 U.S.C. § 102, the reference must teach every element and recitation of the Applicant’s claims. Rejections under 35 U.S.C. § 102 are proper only when the claimed subject matter is identically disclosed or described in the prior art. Thus, the reference must clearly and unequivocally disclose every element and recitation of the claimed invention.

To begin, independent claim 1 recites a unique combination of features including: the first system component receives an assigned unique physical address in response to the

respective position transmitted from the first system component. Therein, as recited in claim 1, the system component is configured to transmit its respective position to the configuration unit; and the configuration unit, in response to the received position, assigns and transmits a unique physical address to this system component.

The Examiner alleges that claim 1 is directed to a distributed control system and is anticipated by Lee. In particular, the Examiner alleges that Lee's file server 400 serves as the respective memories of the system components for storing spatial coordinates and that the server transmits respective positions to "another structure or machine". In addition, the Examiner alleges that Lee implicitly discloses transmission of unique physical addresses to the system components (see page 2 of the Office Action). In other words, the Examiner alleges that system components having respective memories and transmitting their position as set forth in claim 1 is equivalent to a cassette with glass having a file server 400, and the configuration unit as set forth in claim 1 is some structure or machine in Lee.

Referring to Fig. 4 of the Lee, a tester 300a examines if any glasses stored in a cassette 650 have errors such as a short circuit or an open circuit on data lines and transmits the test result data to a file server 400. At this time, the test result data are stored as raw data. The raw data are coordinate data of defects, image data of defects, defect contents such as a short circuit or an open circuit, and the like. Furthermore, the tester 300a transmits summary data, which is processed from the result data of the tester, to a tester server 200a. For example, the summary data can be a number of defective glasses (col. 5, lines 18-28).

If the tester 300a finishes testing the glasses in the cassette 650, the host 100 controls the AGV 600 to transfer the cassette 650 to the repairer 300b. When the cassette 650 moves to the

repairer 300b, the repairer 300b reads the raw data on the cassette 650 (specifically the glasses stored in the cassette) processed in the previous step from the file server 400. At this time, the repairer 300b searches the file server 400 on the key of the cassette ID and retrieves the test result data on the cassette from the file server 400 (col. 5, lines 37-45). The repairer 300b utilizes the test result data on the cassette and repairs the glasses stored in the cassette. If the repairer 300b completes repairing, the file server stores the raw data (for instance, coordinate data of repair and contents of repair), whereas the summary data (for example, the number of repaired glasses) is transmitted to the repairer server 200b (col. 5, lines 46-55).

In Lee, however, the file server 400 simply stores coordinate data of the defects and transmits this data to the machine that requests it. In Lee, one machine, *e.g.* the tester, determines the coordinate data for the repair and transmits it to the server, and another machine, *e.g.* the repairer requests this raw data to perform the repair. In other words, the coordinate data is received from one machine and is transmitted to another machine. That is, in Lee, the machine does not assign and transmit the unique address in response to the received position. Provided the tester determines the coordinate data for repair and transmits it to the file server 400, it is another machine that requests and receives this repair data from the file server. Lee fails to disclose receiving coordinate data from a machine and assigning and transmitting unique physical address to that same machine from which coordinate data was received.

In short, in Lee, the file server receives coordinate data from the tester and transmits this same coordinate data to the repairer. Assuming *arguendo*, that as alleged by the Examiner the cassette's memory is the file server compared to a memory of the system components, the file server receives coordinate data of repair from a tester and transmits it to the repairer and not back

to the tester. That is, the coordinate data from the tester is transmitted to a repairer via a file server and the file server does not assign and transmit a unique physical address back to the tester in response to the received coordinate data.

Moreover, Lee only teaches repair coordinate data. Lee's tester machine determines the coordinates of the glass that needs repair. That is, Lee teaches passing coordinate data for the required repair and not the spatial coordinates of respective positions of the system components. In Lee, for each cassette, the same coordinate data may be passed if repair is required for the glass in the same position. Lee, on the other hand, fails to disclose passing spatial coordinates which are the spatial physical position of the system component, which will always be different since different components cannot occupy the same spatial position or the same physical location.

Therefore, "the first system component receives an assigned unique physical address from the unique physical addresses in response to the respective position transmitted from the first system component," as set forth in claim 1 is not disclosed by Lee. Lee fails to unequivocally disclose assigning and passing a unique physical address in response to the received spatial coordinates of the positions of the components.

In summary, the deficiencies of the Lee reference fall to the Examiner's burden to show inherent inclusion of the claim elements. For at least these exemplary reasons, independent claim 1 is patentably distinguishable from Lee. Claims 2-4 and 6 are patentable at least by virtue of its dependency on claim 1.

Independent claim 8 is directed to a system component for a distributed control system, wherein the system component is configured to transmit the position of the system component,

as the component-specific data, to the communications device via the communications channel; and wherein the system component is configured to receive a unique physical address assigned by the configuration unit via the communications channel. Therein, as recited, the system component is configured to transmit the position of the system component to a communications device, and this same system component is further configured to receive a unique physical address assigned by the configuration unit via the communications channel.

Therefore, Applicant submits that patentability arguments analogous to those presented in connection with the patentability of claim 1 apply to independent claim 8 with equal force.

Dependent claim 9 is patentable at least by virtue of its dependency from claim 8.

Independent claim 10 is directed to a method, which includes, among other steps, a system component receiving a unique physical address in response to the position transmitted from this system component. Therefore, Applicant submits that patentability arguments analogous to those presented in connection with the patentability of claim 1 apply to independent claim 10 with equal force. Dependent claim 11 is patentable at least by virtue of its dependency from claim 10.

Claim Rejection under 35 U.S.C. § 103(a)

Claim 5 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Lee and further in view of U.S. Patent No. 5,751,576 to Monson et al. (hereinafter “Monson”). Applicant respectfully traverses this rejection with respect to the dependent upon claim 1, claim 5.

Applicant has already demonstrated that Lee does not meet all the requirements of independent claim 1. Monson is relied upon only for its teaching of GPS. Clearly, Monson does not compensate for the above-identified deficiencies of Lee. Together, the combined teachings of

these references would not have (and could not have) led the artisan of ordinary skill to have achieved the subject matter of claim 1. Since claim 5 is dependent upon claim 1, it is patentable at least by virtue of its dependency.

In addition, Applicant respectfully points out that one of ordinary skill in the art would not have been motivated to combine the references in a manner indicated by the Examiner. In fact, such combination may be detrimental to the Lee's system. Lee is directed to an LCD assembly line that process a plurality of subjects such as glass and wafers stored in a cassette. That is, Lee need not know the precise position of the cassette but only the positioning of the glass and wafers inside the cassette.

In fact, depending on the subject being processed, the spatial positions may be somewhat different but these differences are irrelevant as the coordinates of importance are the points of defect on the subject. That is, in Lee, the cassette is moved from one machine to another, as such its spatial coordinates change. In other words, determining where to repair the glass cannot be obtained from the spatial coordinates that change with the movement of the machine.

Instead, in Lee, it is more important to determine when the cassette is in a machine and then to simply determine the size of the subject being processed. That is, Lee only teaches passing the repair coordinates that will repeat from subject to subject.

Moreover, one of ordinary skill in the art confronted with improving an assembly line would not have turned to a reference like Monson which teaches a GPS receiver. On assembly lines, sensors and controller are usually used to determine the positioning of the objects being processed. The precise spatial position is of little importance to the assembly line. In short, one of ordinary skill in the art would not have been motivated to combine Lee and Monson. For at

least this additional reason, Applicant respectfully submits that claim 5 is patentable over the combined teachings of Lee and Monson.

New Claims


In order to provide more varied protection, Applicant adds claims 12 and 13. Claims 12 and 13 are patentable over the prior art cited by the Examiner at least by virtue of its dependency on claim 1.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,


George F. Lehnigk
Registration No. 36,359

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: August 6, 2004